

# **Exhibit 1**

Case Administration

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
11/28/2022	WJF	0.10	400	\$40.00	Review email from R. Handler to Richard and respond to same seeking bank statements
12/10/2022	WJF	0.10	400	\$40.00	Review email from Richard regarding bank statements and respond to same
12/21/2022	DM	0.20	100	\$20.00	File November monthly operating report; correspond with W. Factor regarding same.
1/4/2023	DM	0.60	100	\$60.00	Look up good addresses for mail returns.
1/4/2023	WJF	0.40	400	\$160.00	Appear for/attend hearing on chapter 11 status; fee petition and cash collateral
1/9/2023	WJF	0.30	400	\$120.00	Telephone call with R Handler regarding operational issues
1/10/2023	DM	0.50	100	\$50.00	Finish researching better possible addresses for mail returns; correspond with W. Factor and A. Holtschlag regarding same.
1/11/2023	SR	0.60	125	\$75.00	Research addresses for return mail.
1/13/2023	SR	1.40	125	\$175.00	Review return mail; research for new addresses.
		4.20		\$740.00	

Bank's 506(b) Claim for Post-Petition Fees

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
12/23/2022	WJF	1.70	400	\$680.00	Review proof claim filed by Republic and motion for allowance of postpetition fees and interest at default rate (1.0); review state court docket regarding payment of receiver fees (.30); review and analysis of proof of claim filed by receiver (.20);
12/30/2022	DM	0.10	100	\$10.00	File text only objection to Republic Bank's motion (Dkt. No. 281); correspond with W. Factor regarding same.
1/20/2023	DM	0.20	100	\$20.00	Finalize and file objection to Republic's motion (Dkt. no. 281); correspond with W. Factor regarding same.
1/20/2023	WJF	4.00	400	\$1,600.00	Research and analysis of default interest issues (1.0); prepare objection to Republic Bank's request for default interest and attorneys fees (3.0).
1/23/2023	WJF	0.70	400	\$280.00	Prepare amended objection to Republic Claim (.50); telephone call with Bob Handler regarding documents filed on Friday, including 506(c) motion and trying to resolve issues with parties in interest (.20)
2/6/2023	WJF	0.70	400	\$280.00	Call with Brandon Freud and R. Handler discussing issues related to Republic Claim and resolution of objection to claim (.50); follow-up call with R. Handler regarding strategy for dealing with claim objections (.20)
2/6/2023	WJF	1.40	400	\$560.00	Research and analysis of Association lien/mortgage claim and whether their mortgage is avoidable under 544
2/7/2023	WJF	0.70	400	\$280.00	Telephone call with Sean Williams and R. Handler regarding Association issues (.40); follow-up call with R Handler (.20); review emails from R. Handler regarding waterfall (.10)
2/15/2023	DM	0.10	100	\$10.00	File motion to extend dates for responding to complaints, claim objections and 506(c) motion; correspond with W. Factor regarding same.
		9.60		\$3,720.00	

Fee Applications

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
12/9/2022	WJF	0.40	400	\$160.00	Telephone call with Becky regarding fee application and analysis of same
12/13/2022	WJF	0.60	400	\$240.00	Telephone call with Ariane Holtschlag to discuss and explain progress on pending claim objections, fee applications and upcoming deadlines (.50); emails to Ariane regarding fee applications for Powell firm and Worsek firm (.10)
12/13/2022	AH	0.50	375	\$187.50	Telephone call W. Factor regarding outstanding issues including administrative fee applications and potential avoidance actions
12/13/2022	DM	1.10	100	\$110.00	Telephone calls with A. Holtschlag regarding fee applications (.20); begin draft of FactorLaw's final fee application (.50); draft Worsek's first and final fee application and proposed order (.40)
12/13/2022	AH	1.20	375	\$450.00	Begin editing exhibits for fee applications (x3) FactorLaw, Powell, and Worsek
12/14/2022	AH	0.20	375	\$75.00	Correspond with W. Factor and D. Mesikapp regarding fee application for Worsek.
12/14/2022	AH	0.40	375	\$150.00	Correspond with D. Mesikapp regarding multiple professional fee applications.
12/14/2022	AH	0.20	375	\$75.00	Email from/to A. Junia and D. Mesikapp regarding invoices and fee application for Powell Junia P.C.
12/14/2022	DM	1.10	100	\$110.00	Telephone calls with A. Holtschlag regarding fee applications (.20); email information email address at Powell regarding invoices/amount update (.10); update Worsek fee application (.30); draft Powell fee application (.50); correspond with A. Holtschlag regarding same.
12/15/2022	WJF	0.50	400	\$200.00	Review/analyze fee application for Worsek (.10); review fee application for Powell (.10); review final application for FactorLaw (.20); emails regarding FactorLaw fee application (.10)
12/15/2022	AH	2.20	375	\$825.00	Finish editing time detail for FactorLaw's second fee application.
12/15/2022	AH	0.70	375	\$262.50	Review and revise FactorLaw's second fee application.
12/15/2022	AH	0.10	375	\$37.50	Email from/to D. Mesikapp regarding method for sending notice of multiple professional fee applications.
12/15/2022	AH	0.40	375	\$150.00	Review and revise Worsek first and final fee application.
12/15/2022	AH	0.30	375	\$112.50	Review and revise Powell first and final fee application.

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours</u> <u>to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
12/15/2022	DM	1.10	100	\$110.00	Finalize Powell First and Final Fee Application (.30) and Worssek First and Final Fee Application (.30); follow up correspondence with A. Holtschlag regarding same (.10); telephone calls with A. Holtschlag regarding fee applications (.20); finish drafting FactorLaw's final fee app (.20)
12/16/2022	DM	0.50	100	\$50.00	File FactorLaw, Powell, and Worssek fee applications (.30); send all three fee applications for service with BK Attorney Services (.10); follow up correspondence with A. Holtschlag and W. Factor (.10)
12/23/2022	DM	0.60	100	\$60.00	Serve FactorLaw's final fee application on Opentable at new address (.10); serve Powell's first and final fee application on Opentable at new address (.10); serve Worssek's fee application on Opentable at new address (.10); correspond with W. Factor regarding same (.10); draft supplemental certificate of service (.20)
1/3/2023	WJF	0.10	400	\$40.00	Review and respond to email from Laura regarding CDOR fee
1/11/2023	WJF	0.50	400	\$200.00	Attend hearing on fee petitions
1/18/2023	SR	1.70	125	\$212.50	Review fee applications and orders approving (.30); calculate totals fee awards for surcharge motion (1.2); correspond with W. Factor regarding same (.20)
1/23/2023	DM	0.40	100	\$40.00	Research more fee application mail returns and update mailing matrix with new addresses
3/29/2023	WJF	0.50	400	\$200.00	Review and edit draft of fee petition
3/27/2023	WJF	0.70	400	\$280.00	preparing time detail for the application and download same from practice management system (.5); telephone call with paralegal regarding project (.2)
		16.00		\$4,337.50	

506(c) Motion

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
1/3/2023	WJF	1.30	400	\$520.00	Draft/revise motion for 506(c) charge (.90); review lexis database for sample 506(c) motions and download same (.40)
1/12/2023	WJF	0.80	400	\$320.00	Call with R Handler and then R Handler and Jeff Dan to discuss bank's claim and 506(c) charge
1/15/2023	WJF	4.50	400	\$1,800.00	Drafting and revising motion for allowance of 506(c) charges (3.5); research regarding same (1.0)
1/16/2023	WJF	1.30	400	\$520.00	Further revisions to 506(c) motion
1/18/2023	WJF	0.20	400	\$80.00	Revising motion for 506(c) surcharge
1/19/2023	WJF	2.70	400	\$1,080.00	Analysis of amounts owed to attorneys, amounts paid, balance of fees owed to firm, emails with R.Handler regarding same (1.0); revising 506(c) motion and chart showing amounts owed (1.7)
1/20/2023	DM	0.70	100	\$70.00	Draft notice of hearing on surcharge motion and proposed order (.30); correspondence and telephone calls with W. Factor regarding same (.20); finalize and file surcharge motion and proposed order (.20); follow up correspondence
1/23/2023	DM	0.30	100	\$30.00	Draft supplemental certificate of service of surcharge motion (.1); correspondence and telephone call with W. Factor regarding same (.1); send surcharge motion for service to BK Attorney Services for mailing; finalize and file certificate of service of same (.1)
1/25/2023	WJF	0.80	400	\$320.00	Telephone call with R. Handler regarding strategy for trying to work with creditors to reach agreement on amounts owed (.40); preparing potential waterfall of proceeds from sale of real estate (.40)
1/27/2023	WJF	0.20	400	\$80.00	Draft/revise chart reflecting use of proceeds from sale of real estate
2/1/2023	WJF	0.40	400	\$160.00	Attend hearing on disposition of funds from sale and disputes regarding same
2/2/2023	WJF	0.80	400	\$320.00	Preparing spreadsheet regarding allocation of proceeds during call with R. Handler regarding same
		14.00		\$5,300.00	

Cash Collateral

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
11/28/2022	WJF	0.20	400	\$80.00	Telephone call with R Handler regarding fee application (.10); email from and to Laura regarding administrative claims (.10)
11/29/2022	WJF	0.10	400	\$40.00	Review and respond to email from John Servatius regarding budget
11/29/2022	WJF	0.90	400	\$360.00	Review emails from R Handler and his team regarding budget (.20); respond to same (.10); email to creditors regarding cash collateral order for 11/30 (.10); telephone call with R Handler and then R. Handler an J Dan regarding budget (.50);
11/29/2022	WJF	0.90	\$400.00	\$360.00	Review emails from R Handler and his team regarding budget (.20); respond to same (.10); email to creditors regarding cash collateral order for 11/30 (.10); telephone call with R Handler and then R.Handler an J Dan regarding budget (.50)
11/29/2022	WJF	0.10	\$400.00	\$40.00	Review and respond to email from John Servatius regarding budget
11/30/2022	WJF	0.10	\$400.00	\$40.00	Email to creditors regarding cash collateral order
11/30/2022	WJF	1.10	\$400.00	\$440.00	Email to E Buck regarding cash collateral order (.10); telephone call with R Handler regarding cash collateral order, account balance and expenses (.20); telephone call with J Paulsen to update him on covering hearing today and open issues for hearing that may be addressed (.40); revisions to cash collateral order (.30); create redline of same (.10)
11/30/2022	JKP	0.60	\$400.00	\$240.00	Prepare for and attend post-confirmation status and hearing on cash collateral.
12/1/2022	WJF	0.70	400	\$280.00	Email to Bob, Laura and John regarding cash position in connection with cash collateral order (.10); create word version of Cash collateral order and email to Erich Buck regarding same (.10); review bank statements in connection with cash position to help (.5)
12/2/2022	WJF	0.30	400	\$120.00	Review / analyze bank statements and cash collateral budget (.20); emails to Bob Handler regarding same (.20)
12/02/2022	WJF	0.30	\$400.00	\$120.00	Review / analyze bank statements and cash collateral budget (.20); emails to Bob Handler regarding same (.20)
12/02/2022	WJF	0.70	\$400.00	\$280.00	Telephone call with R Handler and Laura Delucca regarding cash balance and checks that were issued and cleared (.30); telephone call with R Handler and J. Dan regarding fees owed to GM and payments to them (.20); further call with R. Handler regarding tasks that need to be completed in December, including claim objections (.20)

<u>Trans Date</u> <u>Tkpr</u>	<u>Hours</u> <u>to Bill</u>	<u>Rate</u>	<u>Amount</u> <u>Description</u>
12/5/2022 WJF	0.40	400	\$160.00 Revisions to order form based upon comments from Erich Buck (.20); generate redline of same (.10); email to creditors regarding same (.1)
12/5/2022 WJF	0.20	400	\$80.00 Final review of cash collateral order dated 11/30 to make sure it conforms to final comments and then submit to DOTF with email regarding same
12/5/2022 WJF	0.10	400	\$40.00 Review and respond to email from Erich regarding potential additional changes to cash collateral order
1/3/2023 WJF	0.90	400	\$360.00 Emails to Bob and Laura regarding cash collateral order and checks that cleared so we have an accurate cash balance (.30); telephone call Bob Handler regarding cash collateral, 506(c) issues and administration of case (.60)
	7.60		\$3,040.00



Plan of Reorganization

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
11/22/2022	WJF	0.10	400	\$40.00	Emails with R Handler regarding notice of plan effective date
11/22/2022	DM	1.00	100	\$100.00	Finalize notice of plans effective date and administrative claims bar date (.30); prepare mailing matrix/excel sheet for same (.50); correspond with W. Factor regarding service of notice (.20)
11/22/2022	WJF	0.10	400	\$40.00	Emails with R Handler regarding notice of plan effective date
11/23/2022	WJF	0.30	400	\$120.00	Revisions to notice of plan confirmation and effective date (.20); review certificate of service and emails with D. Mesikapp regarding same (.10)
11/23/2022	WJF	0.30	400	\$120.00	Revisions to notice of plan confirmation and effective date (.20); review certificate of service and emails with Danielle regarding same (.10)
11/23/2022	DM	1.60	100	\$160.00	Telephone call with W. Factor regarding notice of plan effective date and service of same (.30); look up addresses for service of notice of plan effective date (.70); finalize service list for mailing notice of plan effective date (.30); draft notice of filing notice of plan confirmation (.30)
		3.40		\$580.00	

Claim Objections and Issues

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
12/16/2022	WJF	0.10	400	\$40.00	Track down and send info to Richard regarding proof of claims
12/20/2022	WJF	1.50	400	\$600.00	Download and process bank statements into usable format for review and use in connection with claim objections
12/22/2022	WJF	1.10	400	\$440.00	Reviewing and editing claim objection and avoidance complaint regarding POC filed by Abboud & Company
12/22/2022	WJF	1.10	400	\$440.00	Telephone call with R Handler regarding claims objections and process for dealing with same and email from J. Dan regarding Republic claim (.40); telephone call with J Dan regarding his email and his views on proof of claim filed by receiver and others (.50); review and analysis of bank statements from 2017 (.20)
12/23/2022	WJF	0.80	400	\$320.00	Telephone call with R Handler and Richard Schroeder regarding background issues related to Abboud and Company transactions with Cite'; spin off of Cite' from Renaissance Plaza; loans from Abboud to related entities and financial condition of Cite'
12/23/2022	WJF	1.10	400	\$440.00	Further revisions to claim objection and complaint for claim filed by Abboud & Co.
12/28/2022	DM	0.20	100	\$20.00	File and serve objection to claim no. 6; correspond with W. Factor regarding same.
1/4/2023	WJF	0.30	400	\$120.00	Follow-up call with R Handler regarding resolving claim objections and implementing strategy for getting creditors to agree
1/23/2023	DM	0.10	100	\$10.00	Finalize and file amended objection to Republic Bank's claim; correspond with W. Factor regarding same.
1/26/2023	WJF	0.90	400	\$360.00	Reviewing and analyzing spreadsheet regarding use of profits (.40); research/analysis of ARAMCO claim and objection to claim (.50)
1/27/2023	WJF	0.30	400	\$120.00	Research and analysis regarding assertion that ERC finds are subject to citation lien in favor of ARAMCO
1/31/2023	WJF	0.50	400	\$200.00	Research and analysis on Association's assertion of mortgage on real estate to secure unpaid CAM
2/3/2023	WJF	1.00	400	\$400.00	Telephone call with Erich Buck regarding Abboud claim
2/5/2023	WJF	1.70	400	\$680.00	Research and analysis of mortgage lien asserted by Association
		10.70		\$4,190.00	

Complaint to Avoid Lien

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
12/27/2022	SR	1.30	125	\$162.50	Docket summons and complaint; serve same; draft certificate of service for same; correspond with W. Factor;
12/28/2022	DM	0.10	100	\$10.00	Prepare mailing of summons and adversary complaint to Lake Point Tower.
12/28/2022	WJF	3.90	400	\$1,560.00	Preparing objection and complaint related to POC filed by Condo Association (1.8); researching Illinois law regarding requirements of a mortgage on real property (.70); Reviewing and analyzing LPTCA Proof of Claim an REA in connection with objection to claim (1.0); futher research regarding emcumbance on land and whether it is a mortgage (.30); preparing notice of objection, cover sheet and file adversaery (.50); telephone call with R Handler regarding objection to LPTCA POC (.20) telephone call with D Hassel regarding mortgage and lien issues on real estate and understanding of property law (.40)
12/29/2022	DM	0.40	100	\$40.00	Serve adversary summons and complaint on Lake Point Tower (.10); draft certificate of service of same; correspond with W. Factor regarding same (.10); finalize and file summons service executed (.10); follow up correspondence (.10).
12/29/2022	WJF	0.30	400	\$120.00	Telephone call from Sean Williams regarding complaint filed against Association
1/19/2023	WJF	0.20	400	\$80.00	Call with Sean Williams regarding extension of time to answer complaint
1/27/2023	WJF	2.40	400	\$960.00	Call with Sean Williams and Robert Handler regarding objection to claim filed by Association (.30); followup call with R. Handler regarding addressing issues raised by Association (.30); research and analysis of Association's claim that they hold a proper (1.8)
1/28/2023	WJF	0.40	400	\$160.00	Research regarding contention that citation lien attaches to ERC funds
		9.00		\$3,092.50	

Settlement with Creditors

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours to Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
2/1/2023	WJF	0.90	400	\$360.00	Telephone call with R Handler regarding settlement issues (.20); research and analysis of association assertion regarding lien on real estate (.70)
2/13/2023	WJF	0.10	400	\$40.00	Emails to/from Brandon regarding continuing motions and hearings
2/15/2023	WJF	1.60	400	\$640.00	Draft/revise motion to reset dates for all parties (1.50); review and respond to email from Brandon regarding settlement (.10)
2/21/2023	WJF	0.80	400	\$320.00	Telephone conference with Erich Buck, his colleague and R. Handler regarding waterfall (.70); follow-up call with R. Handler regarding next steps (.10)
2/21/2023	WJF	0.20	400	\$80.00	Follow-up call with R Handler regarding administrative claims still outstanding and scheduling of hearing (.2); review docket to see that matters have been continued to 3/15
2/22/2023	JKP	0.20	400	\$80.00	Prepare for and attend hearing on multiple matters
2/23/2023	WJF	0.20	400	\$80.00	Telephone call with R Handler regarding amounts needed to pay administrative claims
2/24/2023	WJF	0.20	400	\$80.00	Email to B. Freud regarding status of settlement (.10); call with R. Handler regarding same (.10)
2/28/2023	WJF	0.20	400	\$80.00	Telephone call with R Handler regarding settlement process with creditors
3/10/2023	WJF	0.10	400	\$40.00	Telephone call with R Handler regarding cite settlement status
3/10/2023	WJF	1.80	400	\$720.00	Review/analyze spreadsheet showing the allocation of proceeds (1.20); telephone call with R Handler regarding same (.20); telephone call with Eric Buck regarding same (.40)
3/11/2023	WJF	0.90	400	\$360.00	Revisions to waterfall showing distributions (.70); telephone call with R Handler and John Servatius regarding same (.20)
3/13/2023	WJF	0.10	400	\$40.00	Communicate with Sean Williams regarding waterfall
3/15/2023	WJF	0.70	400	\$280.00	Call with Brandon Freud regarding email from Eric Buck (.20); attend status hearing (.50)
3/15/2023	WJF	0.20	400	\$80.00	Telephone call with R. Handler regarding drafting settlement agreement and filing fee applications
3/20/2023	WJF	0.50	400	\$200.00	Revisions to settlement agreement
3/21/2023	WJF	2.30	400	\$920.00	Drafting settlement agreement (1.8); call with R Handler regarding settlement agreement (.20); analysis of plan and issues regarding closing case (.30)
3/23/2023	WJF	0.50	400	\$200.00	revisions to settlement agreements (.4); email to creditors regarding settlement agreement (.10)
3/29/2023	WJF	0.10	400	\$40.00	Emails with Eric regarding latest draft a settlement agreement

<u>Trans Date</u>	<u>Tkpr</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>	<u>Description</u>
		<u>to Bill</u>			
3/30/2023	WJF	0.20	400	\$80.00	telephone call with John Reddine re IDOR consent to settlement
3/27/2023	WJF	0.40	400	\$160.00	telephone call with John Reding and Robert Handler regarding settlement agreement and Illinois Department of revenue position on settlement agreement (.3); email to John regarding settlement agreement terms and attaching drafts of settlement agreement and exhibits (.1)
		12.20		\$4,880.00	

## **Exhibit 2**

Trans Date	Amount	
<b>Client ID 2276.001 Cite Debtor, R. Handler as Trustee</b>		
10/05/2022	462.48	BK Attorney Services fee for service of FactorLaw's First Interim Fee Application (47 recipients).
11/02/2022	93.00	Fee paid to the clerk of the bankruptcy court for three certified copies of the amended order authorizing sale free and clear.
11/08/2022	38.10	UPS expense to send documents from C. Mack's office.
11/14/2022	56.44	FedEx expense for delivery of default notice on W. Moy and Lake Point Tower Investment (2 recipients).
11/23/2022	248.50	BK Attorney Services fee for service of notice of filing and notice of plan effective date (175 recipients).
12/16/2022	469.00	BK Attorney Services fee for service of Powell's First and Final Fee Application (175 recipients).
12/16/2022	498.75	BK Attorney Services fee for service of Worsek's First and Final Fee Application (175 recipients).
12/16/2022	889.00	BK Attorney Services fee for service of FactorLaw's Final Fee Application (175 recipients).
12/23/2022	1.44	Postage expense for service of FactorLaw's Final Fee Application on Opentable, Inc. at updated address (1 recipient).
12/23/2022	1.20	Postage expense for service of Powell's First and Final Fee Application on Opentable, Inc. at updated address (1 recipient).
12/23/2022	1.20	Postage expense for service of Worsek's First and Final Fee Application on Opentable, Inc. at updated address (1 recipient).
12/23/2022	350.00	Filing fee for adversary complaint against J. Robert Abboud & Company.
12/27/2022	3.36	Postage expense for service of the summons and complaint on A. Robert Abboud and Company.
12/28/2022	3.60	Postage expense for service of notice of objection to claim no. 6 filed by Lake Point Tower (1 recipient).
12/29/2022	350.00	Filing fee for adversary complaint against Lake Point Tower Condo Association.
12/29/2022	3.36	Postage expense for service of summons and adversary complaint on Lake Point Tower (1 recipient).
01/23/2023	462.28	BK Attorney Services fee for service of surcharge motion (182 recipients).
<b>GRAND TOTALS</b>		
Billable	3,931.71	